

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiff**

v.

CIVIL NO.: 19-1930 (PAD)

**FUNDS IN THE AMOUNT OF
\$53,082,824.19.00 IN U.S. CURRENCY,
CONTAINED IN THE FOLLOWING
ACCOUNTS UNDER THE NAME OF
BANCO SAN JUAN INTERNATIONAL:**

- a) xxx-x7689 – MERRILL LYNCH
ADDRESS: #15 SECOND ST.,
SUITE 210, GUAYNABO, PR
00968, UP TO \$10,000,000.00;**
- b) xxx-x7059 – MERRILL LYNCH
ADDRESS: 225 LIBERTY ST.,
41ST FL, NEW YORK, NY 10281,
UP TO \$5,000,000.00; AND**
- c) FEDERAL RESERVE BANK OF
NEW YORK ACCOUNT # xxxx-
x228-6, UP TO \$38,082,824.19,
Defendant**

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO DOCKET ENTRIES
17, 18, 19, 20, 21, 23, 24, 26 AND 27**

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, the United States of America, represented by the undersigned attorneys, whom very respectfully STATE AND PRAY:

1. On September 27, 2019, the United States filed a Forfeiture Complaint in the instant case. *See* Docket No. 1. Subsequently, the United States requested that the case be stayed, pending

an ongoing criminal investigation. *See* Docket No. 5. The Court granted the request to stay the case on October 8, 2019, 2019. Docket No. 8.

2. Subsequently, on October 9, 2019, Banco San Juan Internacional filed a Verified Claim (*See* Docket No. 15) and twelve other motions from Docket No. 16 through Docket No. 27. Of those thirteen motions the United States was ordered by the Honorable Court on October 15, 2019 to respond to nine of them by October 29, 2019. These motions contain several requests, such as, a Motion to Dismiss at Dockets Nos. 19 and 20, a Motion for Compliance at Docket Entry No. 21, a Motion to Lift Stay at Docket No. 18, a Motion Requesting a Suppression Hearing at Docket No.24 , and a Motion to Treat this Matter as a Related Case at Docket No. 27.

3. On October 15, 2019, this Honorable Court issued an Order whereby the United States must respond to the motions filed at Docket Nos.17 through 21 and 23, 24, 26 and 27, no later than October 29, 2019.

4. At this time, the undersigned is in the process of responding to the aforementioned motions. However, due to the number of motions that require response, the complexity of this case, and impending concurrent deadlines on other cases currently handled by undersigned attorney, an extension of time of 30 days is respectfully requested to be able to respond to all pending motions.

5. The United States does not make the request in bad faith nor does it foresee the need for additional extensions to respond to all the pending motions.

WHEREFORE, the defendant respectfully requests from this Honorable Court a 30-day extension of time, until November 29, 2019, to file the required responsive pleading.

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will automatically send notifications of this filing to all Attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of October, 2019.

W. STEPHEN MULDROW,
United States Attorney

s/David O. Martorani-Dale

David O. Martorani-Dale

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